

EXHIBIT D

From: Morrison, Haley M.
Sent: Friday, September 12, 2014 10:38 AM
To: Steven Blau (sblau@blauleonardlaw.com)
Cc: Dollarhide, Mary C.; Louis E. Hatcher (LHatcher@watsonspence.com); Alfreda Sheppard (ASheppard@watsonspence.com) (ASheppard@watsonspence.com); shelly leonard (sleonard@blauleonardlaw.com); Jason Brown (jasontbrown@bbpc-law.com)
Subject: FW: Tanner v. TPUSA

Counsel,

Plaintiffs' Second Set of Document Requests remains objectionable. As stated in Defendant's original objections to the RFP, and in the follow-up letter by Ms. Cole, the AT&T contracts are highly confidential and proprietary. Moreover, the records and contract terms you requested have no bearing on Plaintiff's individual or collective claims of unpaid wages.

In any event, the motion to compel date related to the at-issue document request has long since expired.

Thank you,
Haley

From: Steven Blau [mailto:sblau@blauleonardlaw.com]
Sent: Monday, September 08, 2014 11:19 AM
To: Dollarhide, Mary C.; Morrison, Haley M.
Cc: Louis E. Hatcher; Alfreda Sheppard (ASheppard@watsonspence.com); shelly leonard; Jason Brown
Subject: Tanner v. TPUSA

Attached please find Plaintiffs' 2nd Set of Document Requests, previously served on August 13, 2012. TPUSA refused to produce these documents, as per letter dated October 9, 2012, a copy of which is also attached.

These document requests are continuing in character so as to require you to file supplementary answers if you obtain further or different information before trial. The certification of the collective action for customer service representatives from both the Albany and Augusta facilities, now makes production these documents critical and essential to the prosecution of this action. Further, the At&T contract will be a material component of evidence in the anticipated Decertification motions.

We are prepared to stipulate to seal the contract.

Please advise at your earliest convenience.

--

Steven Bennett Blau

Partner

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